

**CORRECTED DIRECT TESTIMONY OF
WILL HARLAN
ON BEHALF OF
SIERRA CLUB
DOCKET NO. 2020-125-E**

INTRODUCTION AND QUALIFICATIONS

Q: Please state your name, position, and business address for the record

A: My name is Will Harlan. I am the Senior Campaign Representative for Sierra Club's Beyond Coal Campaign. Our office is located at 34 Wall Street, Asheville, NC 28801.

Q: On whose behalf are you testifying in this proceeding?

A: I am submitting this testimony on behalf of the Sierra Club.

Q: Have you previously testified before the Public Service Commission of South Carolina ("Commission")?

A: No.

Q: What is the purpose of your direct testimony in this proceeding?

A: On July 2, 2021, a Settlement Agreement was filed by all parties participating in this docket except for CMC Steel South Carolina ("CMC"), which indicated that CMC did not oppose the settlement or the Settlement Agreement. The Parties reached an agreement on all issues. The purpose of my testimony is to present Sierra Club's position on the Settlement Agreement and more specifically, to support the reasonableness of paragraph 24 of the Settlement Agreement and Attachment EE, Parts 1 and 2 (quarterly reports).

Q: Did Sierra Club actively participate in settlement discussions?

A: Yes.

1 **Q: Is Sierra Club a party to the Settlement Agreement and the Joint Motion for**
2 **Approval of Comprehensive Settlement Agreement Resolving all Issues Among the**
3 **Parties?**

4 A: Yes.

5 **Q: Please describe the purpose of Sierra Club's involvement in this Docket?**

6 A: The purpose of Sierra Club's involvement in this case was to evaluate the economics of
7 the coal-fired units owned by Dominion Energy South Carolina ("DESC" or "the
8 Company") and assess the degree to which both recovery of capital costs incurred at the
9 Wateree, Williams, and Cope plants during the period from 2012 through 2019 and
10 continued investment in and operation of these units in the future are just and reasonable

11 **Q: How does the Settlement Agreement address the Sierra Club's involvement in this**
12 **Docket?**

13 A: Paragraph 24 of the Settlement Agreement states that "the Company agrees to file public
14 quarterly reports on the capital expenditures at the Company's three coal plants: Wateree,
15 Williams and Cope until the new Commission-ordered coal retirement studies are
16 complete. The quarterly capital expenditure reports shall include the following
17 information: projected and actual capital expenditures, a list of all capital expenditure
18 projects over \$1 million; historic generation by unit (MWh); and Plant in Service Balances.

19 The quarterly report shall be filed in a form similar to the attached Attachment EE."¹

20 Paragraph 24 and the accompanying Attachment EE ensures that the Company provides
21 transparency around money being spent on the Company's coal plants, two of which
22 (Wateree and Williams) the Company plans to retire in 2028 pursuant to their approved

¹ Attachment EE consists of two parts: Attachment EE (Part 1) and Attachment EE (Part 2).

1 Modified 2020 IRP. After the VC Summer malfeasance, South Carolinians are especially
2 concerned about how ratepayer money is spent by utilities on capital expenditures.
3 Squandering millions on capital investments at aging, outdated, and uneconomic coal
4 plants that the Company plans to retire is not in ratepayers' best interests and deserves
5 closer scrutiny. These quarterly reports will ensure that the public, the parties to this
6 proceeding and the Commission are kept apprised of on-going investments made at these
7 aging coal plants.

8 **Q: What are you requesting of this Commission?**

9 A: On behalf of the Sierra Club, I recommend that the Commission approve the Settlement
10 Agreement without modification.

11 **Q: Do you believe that the Settlement Agreement developed by the parties is reasonable
12 and in the public interest?**

13 A: Yes. The Settlement Agreement represents a reasonable resolution of all the disputed issues
14 in this Docket, including the issues raised by Sierra Club regarding the Company's coal
15 plants: Wateree, Williams and Cope. Accordingly, the Commission should find that the
16 Settlement Agreement, is reasonable and in the public interest and approve the Settlement
17 without modification.

18 **Q: Are you available to answer questions from the Commission if called to do so?**

19 A: Yes.

20 **Q: Does this conclude your testimony?**

21 A: Yes.